

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

|                                 |   |                       |
|---------------------------------|---|-----------------------|
| THOMPSON PRODUCTS, INC.,        | ) |                       |
|                                 | ) |                       |
| Plaintiff,                      | ) |                       |
|                                 | ) |                       |
| v.                              | ) | C.A. No. 05-11810-RGS |
|                                 | ) |                       |
| GLENN THOMPSON, <i>et al.</i> , | ) |                       |
|                                 | ) |                       |
| Defendants.                     | ) |                       |
|                                 | ) |                       |

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**MOTION PURSUANT TO LOCAL RULE 7.1(B)(3) FOR LEAVE TO FILE  
REPLY OF PLAINTIFF, THOMPSON PRODUCTS, INC.,  
TO DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S MOTION TO DISQUALIFY COUNSEL**

Pursuant to Local Rule 7.1(B)(3), Plaintiff, Thompson Products, Inc. ("TPI"), respectfully requests leave to file a reply to Defendants' Opposition to Plaintiff's Motion to Disqualify Counsel Mathew M. Medeiros (the filing being referred to hereinafter as the "Opposition" and Mr. Medeiros and his firm being referred to as "Attorney Medeiros"). The Opposition is supported by the Affidavit of Glenn Thompson In Opposition to Motion to Disqualify (hereinafter the "Affidavit"). Glenn Thompson was, of course, Attorney Medeiros's primary TPI contact in the Prior Litigation as it ran its course over a two-year period. Both the Affidavit and the Opposition that relies upon it contain incomplete, misleading and incorrect statements of material fact and opinion, as TPI will show in a reply citing portions of Attorney Medeiros's own files from the Prior Litigation, recently obtained by counsel for TPI, and the sworn statements of TPI representatives identified in the Opposition and Affidavit. Full development of the record on the Motion to Disqualify, fairness to TPI, and the interest of the Court in

upholding and enforcing the rules of ethics that bind counsel appearing before it dictate that TPI be granted leave to reply to the Opposition.

WHEREFORE, TPI respectfully requests that this motion be granted.

**THOMPSON PRODUCTS, INC.**

By its attorneys,

/s/ Andrew D. Kang

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DATED: December 28, 2005

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I, Andrew D. Kang, hereby certify that on December 22, 2005, I conferred with counsel for Defendants and attempted in good faith to resolve the issues regarding *Defendants' Opposition to Plaintiff's Motion to Disqualify Counsel Mathew M. Medeiros*.

/s/ Andrew D. Kang  
Andrew D. Kang

**CERTIFICATE OF SERVICE**

I, Andrew D. Kang, hereby certify that on the 28th day of December, 2005, I served a copy of the foregoing by U.S. Mail to the following counsel of record:

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/s/ Andrew D. Kang  
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